

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:	)	
GREGORY LEMONT JONES	)	CASE NO: 18-00030-MFH-13
TIFFANY URILA JONES	)	CHAPTER 13
506 B DEBRA DRIVE	)	JUDGE HARRISON
GOODLETTSVILLE, TN 37072	)	
SSN/ITIN: XXX-XX-3802/6590	)	
Debtors.	)	

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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: SEPTEMBER 5, 2018  
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: SEPTEMBER 12,  
2018 AT 8:30 AM IN COURTROOM 1, 2ND FLOOR, CUSTOMS HOUSE, 701  
BROADWAY, NASHVILLE, TN 37203**

**NOTICE OF DEBTORS' APPLICATION TO EXTEND BAR DEADLINE FOR FILING  
A CLAIM BY DEBTOR FOR MISSOURI CHILD SUPPORT**

The Debtor has asked the court for the following relief: to extend the bar deadline for filing of claim, namely **Missouri Child Support**

**YOUR RIGHTS MAY BE AFFECTED.** If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at:  
<https://ecf.tnmb.uscourts.gov><<https://ecf.tnmb.uscourts.gov>>.

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by viewing the case on the court's website at <<https://ecf.tnmb.uscourts.gov>>.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

Date: August 3, 2018

Signature: /s/ Joseph Wharton  
JOSEPH WHARTON #034508  
Clark & Washington, LLC  
Attorney for Debtor  
237 French Landing Drive  
Nashville, TN 37228  
615-251-9782; Fax: 615-251-8919  
[cwnashville@cw13.com](mailto:cwnashville@cw13.com)

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Debtors.	)	

**DEBTOR'S APPLICATION FOR AN ORDER ALLOWING DEBTORS TO  
EXTEND THE TIME FOR FILING OF CLAIM FOR MISSOURI CHILD SUPPORT**

Come now the Debtor, by and through Counsel and pursuant to Fed. R. Bankr. P.

9006(b)(1), move for an Order allowing the Debtors to Extend July 2, 2018 Bar Date for the filing of a claim by Debtors on behalf of the creditor **Missouri Child Support** pursuant to Fed. R. Bankr. P. 3004, and state as follows:

1. That the Debtor filed a Petition for Relief with this Court on January 3, 2018 and the case was confirmed on March 27, 2018
2. That the deadline for filing non-governmental proofs of claims expired on March 14, 2018, for non-governmental claims. The deadline for filing proofs of claims for governmental claims expired on July 2, 2018
3. That the Debtor was assured from **Missouri Child Support** on multiple occasions that they would file both claims as a part of an agreement resolving a Motion to Compel before the July 2, 2018 bar deadline. However, these claims were not filed by **Missouri Child Support** before the July 2, 2018 bar deadline. Clark and Washington, believing that the State of Missouri would file these claims as agreed, did not file the claims due to excusable neglect. The Debtor moves to extend the Bar Date to allow time for Debtor to now file the necessary proof of claims on behalf of **Missouri Child Support**.

4. Debtor estimates that when the priority proofs of claims are filed, Debtor's plan payment will remain the same.

5. That the addition of these claims will not delay the paying of the guaranteed dividend to the unsecured creditors and will not reduce said dividend.

**WHEREFORE, DEBTOR PRAYS** that this Court enter an Order allowing Debtor to extend the bar date for the filing of claims by Debtor, in the name of creditor, namely **Missouri Child Support** to October 1, 2018, as governed by Fed. R. Bankr. P. 3004 and 9006 and also requests such other relief as this Court deems just.

This the 3rd day of August, 2018

/s/ Joseph Wharton  
JOSEPH WHARTON #034508  
Attorney for Debtor  
Clark & Washington, L.L.C.  
237 French Landing Drive  
Nashville, TN 37228  
(615) 251-9782; Fax: (615) 251-8919  
Email: cwnashville@cw13.com

#### CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 3<sup>rd</sup> day of August, 2018, a true and correct copy of the foregoing has been served in the following manner:

***Email by Electronic Case Noticing to:***

Beth R. Derrick, Assistant U.S. Trustee  
Henry E. Hildebrand, III, Chapter 13 Trustee

***By U.S. Postal Service, postage prepaid to:***

W.S. Badcock Corporation, PO Box 724, Mulberry FL 33860  
all creditors listed in the attached mailing matrix

***By Certified Mail to:***

***Total Mailings by U.S. Postal Service: 37***

/s/ Joseph Wharton

JOSEPH WHARTON #034508

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Debtors.	)	

**ORDER GRANTING DEBTORS' APPLICATION FOR AN ORDER EXTENDING THE  
TIME FOR THE FILING OF CLAIMS FOR MISSOURI CHILD SUPPORT**

Upon consideration of the Motion Extending the Period for Filing a Claim for **Missouri Child Support** by the Debtor filed herein on August 3rd, 2018; and the thirty (30) days having passed within which to file an objection; it is

**ORDERED**, that the Debtors may file claims on behalf of **Missouri Child Support** to be paid as a priority claim and the Motion to Extend the Period of Filing a claim for **Missouri Child Support** until October 1, 2018 by the Debtors shall be granted; it is further

**ORDERED**, that the debtors' plan payment shall remain the same, it is further

**ORDERED**, that the dividend to unsecured creditors shall remain the same.

**This Order Was Signed And Entered Electronically As Indicated At The Top Of This Page.**

APPROVED FOR ENTRY:

/s/ Joseph Wharton  
JOSEPH WHARTON #034508  
Attorney for Debtor  
Clark & Washington, L.L.C.  
237 French Landing Drive  
Nashville, TN 37228  
(615) 251-9782; Fax: (615) 251-8919  
Email: cwnashville@cw13.com

**PROPOSED**